8/19/82 Copy to Nelson 12

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HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

AUG 9 1982

030001

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DEPUTY DIRECTOR OF
PESTICIDE PROGRAMS

NOTE TO LOIS ROSSI

I was talking with Wayne Ormrod last week about the 2,4-D Task Force and where they are headed. It seems there has finally been an agreement reached that they will test a typical 2,4-D product and will not conduct the kind of testing that we have been urging them to do. As Gene Paynter said at one of our meetings "that's ok with us if they insist on testing only the typical tech and not a high dioxin formulation but they will have to live with whatever consequences there are of that if we cannot properly interpret the test".

However, Wayne pointed out that one of the problems both countries will have with this is how much more impurity may be present than that in the test substance and still be considered substantially the same as the test substance and therefore registerable. He is going to within the next ten days or two weeks propose limits on impurities and a rationale for them and he will be communicating to you for EPA review.

I agree fully with Wayne that before we are saddled with a decision we ought to come up with allowable limits on these impurities and that we ought to if at all possible come up with identical limits or substantially similar limits at least for both the United States and Canada. I would like to be involved in whatever decision is ultimately made on this issue. So when you receive Wayne's materials and have an opportunity to put them through proper review please schedule a meeting with me to discuss the options and what we think we ought to do. I think the rationale by which we reach a conclusion is going to be as important as the conclusion itself and therefore would like to assess both of these aspects of the Canadian proposal and if we do not agree to construct a counter proposal.

Ed Johnson

Dictated but not read

cc:
M. Conlon
B. Dickinson
D. Campt

Hed 8 12

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| **Chemical:** | **2-4,D** |
| ***PC Code:*** | ***030001*** |
| **HED File Code** | **13100 Other Tox Documents** |
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